

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE: XARELTO (RIVAROXABAN) (’310) PATENT LITIGATION	MDL No. 21-3017-RGA
BAYER PHARMA AG, BAYER AG and JANSSEN PHARMACEUTICALS, INC.,  Plaintiffs,  v.  HETERO LABS LIMITED, ASCENT PHARMACEUTICALS INC. and CAMBER PHARMACEUTICALS, INC.,  Defendants.	C.A. No. 25-754-RGA
BAYER PHARMA AG, BAYER AG, and JANSSEN PHARMACEUTICALS, INC.,  Plaintiffs,  v.  LUPIN LIMITED, et al.,  Defendants.	C.A. No. 21-314-RGA-LDH (consolidated)

**STIPULATION AND ORDER REGARDING STAY**

WHEREAS, Plaintiffs Bayer Pharma AG, Bayer AG, and Janssen Pharmaceuticals, Inc., (collectively, “Plaintiffs”) filed C.A. No. 25-754-RGA against Defendants Hetero Labs Limited, Ascent Pharmaceuticals Inc., and Camber Pharmaceuticals, Inc. (collectively “Hetero”) asserting U.S. Patent No. 10,828,310 (“the ’310 patent”); and

WHEREAS, Plaintiffs are engaged in related litigation against a number of defendants in connection with the '310 patent, which are coordinated and consolidated under MDL No. 21-3017-RGA and C.A. No. 21-314-RGA-LDH (consolidated), which is currently stayed pending the conclusion of the proceedings in *Bayer Pharma Aktiengesellschaft v. Mylan Pharms. Inc.*, No. 2023-2434 (Fed. Cir.);

NOW, THEREFORE, Plaintiffs and Hetero hereby STIPULATE, and request that the Court ORDER, as follows:

1. The Court's Orders staying the case in C.A. No. 21-314 ("Stay Orders," D.I. 144, 153) shall apply to C.A. No. 25-754-RGA.
2. The Stipulated Protective Order in C.A. No. 21-314-RGA-LDH (consolidated) (D.I. 36, 37) shall apply.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Derek J. Fahnestock*

---

Rodger D. Smith (#3778)  
Derek J. Fahnestock (#4705)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@morrisnichols.com  
rsmith@morrisnichols.com  
dfahnestock@morrisnichols.com

*Attorneys for Plaintiffs Bayer Pharma AG,  
Bayer AG and Janssen Pharmaceuticals, Inc.*

MORRIS JAMES LLP

*/s/ Kenneth L. Dorsney*

---

Kenneth L. Dorsney (#3726)  
Cortlan S. Hitch (#6720)  
3205 Avenue North Boulevard, Suite 100  
Wilmington, DE 19803  
(302) 888-6800  
kdorsney@morrisjames.com  
chitch@morrisjames.com

*Attorneys for Defendants Hetero Labs  
Limited, Ascent Pharmaceuticals Inc., and  
Camber Pharmaceuticals, Inc.*

SO ORDERED this 24 day of October, 2025.

*/s/ Richard G. Andrews*

---

UNITED STATES DISTRICT JUDGE